

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

In re:)	Chapter 11
)	
Product Quest Manufacturing, LLC, <i>et al.</i>,¹)	Case No. 18- 50946
)	(Joint Administration Pending)
)	
Debtors.)	
<hr/>)	

MOTION FOR ADMISSION OF DIMITRI G. KARCAZES, *PRO HAC VICE*

Pursuant to Rule 2090-1(b) of the Local Rules of Practice and Procedure for the United States Bankruptcy Court for the Middle District of North Carolina ("Local Bankruptcy Rules") and Rule 83.1(d) of the Local Rules of Practice and Procedure for the United States District Court for the Middle District of North Carolina ("Local Civil Rules"), Madison Capital Funding LLC, as administrative agent ("Agent") and its local counsel, Matthew P. Weiner of the law firm Poyner Spruill LLP, hereby move for the admission to this Court of Dimitri G. Karcazes, Esq. ("Movant") of the law firm Goldberg Kohn Ltd., to appear *pro hac vice* as counsel for Agent. Movant does hereby declare:

1. Movant is a member in good standing authorized to practice in the State of Illinois (admitted November 4, 1999, State Bar No. 6270040), and has been admitted to the District Court for the Northern District of Illinois.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Ei LLC (6099); (ii) Product Quest Manufacturing, LLC (4401); (iii) Scherer Labs International, LLC (5258); (iv) Product Quest Logistics, LLC (6199); (v) JBTRS, L.L.C. (1249); and (vi) PQ Real Estate LLC (4569). The Debtors' service address is: 2865 N. Cannon Blvd., Kannapolis, North Carolina 28083.

2. Pursuant to Rule 83.1 of the Local Civil Rules, Movant will be assisted in this matter by local counsel, Matthew P. Weiner of the law firm Poyner Spruill LLP, who is a member in good standing of the United States District Court for the Middle District of North Carolina.

3. Movant has not been disciplined by any court or administrative body, there are no currently pending disciplinary proceedings against Movant, and Movant has not resigned while any disciplinary proceedings were pending in the past.

4. Contact information for the respective counsels is as follows:

Dimitri G. Karcazes
Goldberg Kohn Ltd.
55 East Monroe Street, Suite 3300
Chicago, Illinois 60603
Email: dimitri.karcazes@goldbergkohn.com
Telephone: 312-201-4000
Facsimile: 312-863-7476
Illinois State Bar No.: 6270040
Attorney for Madison Capital Funding LLC, as Agent

For local counsel:

Matthew P. Weiner
Poyner Spruill LLP
301 Fayetteville Street, Suite 1900
Raleigh, North Carolina 27601
Email: mweiner@poynerspruill.com
Telephone: (919) 783-2954
Facsimile: (919) 783-1075
NC State Bar No.: 37128
Local Civil Rule 83.1 Counsel for Madison Capital Funding LLC, as Agent

5. In the past three years, to the best of his knowledge, Movant has not appeared before the United States Bankruptcy Court for the Middle District of North Carolina. In the past three years, to the best of his knowledge, Movant has neither appeared nor applied to appear *pro hac vice* before any other court in the State of North Carolina.

6. Movant has read and is familiar with the Local Bankruptcy Rules, the Local Civil Rules, the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence.

7. Movant hereby submits to the disciplinary jurisdiction of this Bankruptcy Court for any misconduct in connection with any matters for which Movant is appearing.

8. The Declaration of the Applicant supporting this Motion is attached hereto as Exhibit A.

WHEREFORE, counsel prays the Court as follows:

1. That this Motion be granted for the purposes set forth herein and that Movant be specially permitted to appear in this action on behalf of Madison Capital Funding LLC, as Agent; and

2. For such other and further relief as the Court may deem just and proper.

This the 10th day of September, 2018.

/s/Matthew P. Weiner

Matthew P. Weiner
Poyner Spruill LLP
301 Fayetteville Street, Suite 1900
Raleigh, North Carolina 27601
Email: mweiner@poynerspruill.com
Telephone: (919) 783-2954
Facsimile: (919) 783-1075
NC State Bar No.: 37128
Local Civil Rule 83.1 Counsel for Madison Capital
Funding LLC, as Agent

-and-

/s/ Dimitri G. Karcazes

Dimitri G. Karcazes
Goldberg Kohn Ltd.
55 East Monroe Street, Suite 3300
Chicago, Illinois 60603
Email: dimitri.karcazes@goldbergkohn.com
Telephone: 312-201-4000
Facsimile: 312-863-7476
Illinois State Bar No.: 6270040
Attorney for Madison Capital Funding LLC, as
Agent

CERTIFICATE OF SERVICE

I, Matthew P. Weiner, certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on this date, I served a copy of the foregoing ***Motion for Admission Pro Hac Vice for Dimitri G. Karcazes*** on the following parties in the manner indicated:

Product Quest Manufacturing, LLC 330 Carswell Ave. Holly Hill, FL 32117 <i>Debtor</i> (via US Mail)	John Paul H. Cournoyer John A. Northen Northen Blue, LLP 1414 Raleigh Road Chapel Hill, NC 27517 <i>Debtor's Counsel</i> (via ECF)
William P. Miller Bankruptcy Administrator, MDNC 101 South Edgeworth Street Greensboro, NC 27401 (via ECF)	

I certify under penalty of perjury that the foregoing is true and correct.

Dated: September 10, 2018

POYNER SPRUILL^{LLP}

By: /s/ Matthew P. Weiner
Matthew P. Weiner
NC Bar No. 37128
Post Office Box 1801
Raleigh, NC 27602
Telephone: (919) 783-2954
Facsimile: (919) 783-1075
Email: mweiner@poynerspruill.com

Local Civil Rule 83.1 Counsel for Madison
Capital Funding LLC, as Agent

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT
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In re:)	Chapter 11
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)	(Joint Administration Pending)
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Debtors.)	
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DECLARATION OF DIMITRI G. KARCAZES

DIMITRI G. KARCAZES declares as follows:

1. I am a member of the law firm of Goldberg Kohn Ltd. with an address of 55 East Monroe Street, Suite 3300, Chicago, Illinois 60603. My telephone number is (312) 201-4000 and my email address is dimitri.karcazes@goldbergkohn.com.

2. I am a member in good standing of the State Bar of Illinois (No. 6270040 – admitted November 4, 1999), and am admitted to practice before the District Court for the Northern District of Illinois.

3. I am in good standing in all courts where I have been admitted.

4. I have not been the subject of any disciplinary action by any court or administrative body, there are currently no pending disciplinary proceedings against me, and I have not resigned while any disciplinary proceedings were pending against me in the past.

² The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Ei LLC (6099); (ii) Product Quest Manufacturing, LLC (4401); (iii) Scherer Labs International, LLC (5258); (iv) Product Quest Logistics, LLC (6199); (v) JBTRS, L.L.C. (1249); and (vi) PQ Real Estate LLC (4569). The Debtors' service address is: 2865 N. Cannon Blvd., Kannapolis, North Carolina 28083.

5. My appearance in this matter will be in association with Matthew P. Weiner of the law firm Poyner Spruill LLP.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of September, 2018.

/s/ Dimitri G. Karcazes

Dimitri G. Karcazes